

REMARKS

This is intended as a full and complete response to the Office Action dated November 3 2005, having a shortened statutory period for response set to expire on February 3, 2006. Please reconsider the claims pending in the application for reasons discussed below.

Information Disclosure Statements

Applicants request acknowledgement and consideration of the Information Disclosure Statements having entry dates of September 2, 2004 and April 8, 2004. Additionally, Applicants request acknowledgement that the prior art cited in earlier U.S. Application No. 10/288,229, which this present application is a continuation-in-part, has been reviewed.

Claim Objections

Claim 78 stands objected to because the recitation line "the optical line" should be changed to "an optical line." The appropriate correction has been made. Accordingly, Applicant respectfully requests withdrawal of the objection and allowance of the claim.

Claim Rejections - 35 U.S.C. § 102

Claims 1-4, 13, 70, 71, 77, 78, 81 and 86 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Tubel, et al* (U.S. Patent No. 6,531,694). In response, Applicants respectfully traverse the rejection. Furthermore, Applicants have canceled claim 78.

Claims 1 and 81 include the limitation of a casing string comprising a downhole deployment valve operated or configured to substantially obstruct a bore of the casing string in a closed position and to provide a passageway for a tool to pass through the bore in an open position. By contrast to this obstruction of the casing bore, *Tubel, et al* discloses a valve or sliding sleeve carried by a tubing, which can be a drill pipe, coiled tubing or production tubing. See, column 9, lines 28-31 and 56-59. Therefore, *Tubel, et*

a/l fails to teach, show or suggest each and every limitation of claim 1 or 81. Applicants submit that claims 1 and 81 and all claims dependent thereon are allowable. Accordingly, Applicants respectfully request withdrawal of the rejection and allowance of claims 1-4, 13, 81 and 86.

Claim 70 has been amended to include the limitations of claim 79, which was dependent of claim 70 and indicated to be allowable. Therefore, Applicants submit that claim 70 and all claims dependent thereon are allowable. Accordingly, Applicants respectfully request withdrawal of the rejection and allowance of the claims.

New Claims

Applicants submit that *Tubel, et al* fails to teach, show or suggest a casing string including a downhole deployment valve, which has a housing having a fluid flow path therethrough, a valve member operatively connected to the housing for selectively obstructing the flow path and an optical sensor physically connected to the housing, wherein the sensor is adapted to enable sensing a seismic wave, as recited in claim 95. Applicants submit that claim 95 and claim 96 dependent thereon are in condition for allowance and respectfully request allowance thereof.

Furthermore, the Examiner states that *Tubel, et al* discloses a seismic sensor based on a citation to column 9, line 53, where "vibration sensors" are disclosed. However, and, in contradiction to the Examiner's assertion regarding these vibration sensors, Applicants submit that the vibration sensors disclosed in *Tubel, et al* are not inherently capable of measuring seismic waves. For example, *Tubel, et al* discloses the vibration sensors positioned on tubing inside a wellbore to measure vibration of an electric submersible pump as discussed at column 10, lines 43-46. Consequently, *Tubel, et al* does not disclose "a sensor adapted to enable sensing a seismic wave" since there is no disclosure of seismic waves that are outside the wellbore being transferred to the vibration sensor on the tubing inside the wellbore.

Allowable Subject Matter

Claims 61-65, 68, 69 and 88-94 are allowed. Applicants acknowledge allowance of these claims.

Claims 14, 17, 72, 73, 76, 79, 80, 82, 85, and 87 stand objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form. In response, Applicants submit that claim 70 represents claim 79 written in independent form. Further, Applicants submit that the independent claims from which the pending claims depend are allowable as discussed above. Accordingly, Applicants respectfully request withdrawal of the objection and allowance of the claims.

Conclusion

The references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed. Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,

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